

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 23-
v.	:	VIOLATIONS:
MARC VINCENT	:	18 U.S.C. § 1425(a) (procurement of citizenship unlawfully – 1 count)
	:	18 U.S.C. § 1425(b) (procurement of citizenship unlawfully – 1 count)
	:	18 U.S.C. § 1015(a) (false statements in relation to naturalization - 3 counts)

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about March 15, 2017, through on or about February 9, 2018, in the Eastern District of Pennsylvania, defendant

MARC VINCENT

knowingly procured, contrary to law, naturalization as a United States citizen for himself, by making in connection with his application for naturalization knowingly false representations and statements on his Form N-400, Application for Naturalization, and in sworn statements to immigration and naturalization officials, including:

- a. that he had never been involved in any way with forcing or trying to force someone to have any kind of sexual contact or relations, when in fact, as defendant VINCENT then knew, these representations and statements were false based on his crimes committed beginning in or about July 2015 through at least on or about February 9, 2018, that is, Rape by Forcible Compulsion, in

violation of 18 PA C.S.A. § 3121(a)(1), and Unlawful Contact with Minor, in violation of 18 PA C.S.A. § 6318(a)(1); and

- b. that he had not committed, assisted in committing, or attempted to commit a crime or offense for which he had not been arrested, when in fact, as defendant VINCENT then knew, these representations and statements were false based on his crimes committed beginning in or about July 2015 through at least on or about February 9, 2018, that is, Rape by Forcible Compulsion, in violation of 18 PA C.S.A. § 3121(a)(1), and Unlawful Contact with Minor, in violation of 18 PA C.S.A. § 6318(a)(1).

In violation of Title 18, United States Code, Section 1425(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about March 15, 2017, through on or about February 9, 2018, in the Eastern District of Pennsylvania, defendant

MARC VINCENT

knowingly procured, obtained and applied for naturalization as a United States citizen for himself, to which he was not entitled, because at the of time of his application for naturalization:

- a. the defendant VINCENT could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1427, in that he was not a person of “good moral character,” given that he gave false testimony for the purpose of obtaining any benefits under Chapter 12 of Title 8 of the United States Code, as set forth and charged in Count 1 of this Indictment; and
- b. the defendant VINCENT could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1427, in that he was not a person of “good moral character,” given that throughout the time he was pursuing his application for naturalization and in the preceding years before his application, he was forcing, and trying to force someone to have any kind of sexual contact or relations.

In violation of Title 18, United States Code, Section 1425(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2018, in the Eastern District of Pennsylvania, defendant

MARC VINCENT

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant VINCENT stated in response to question 14(E) that he had never been involved in any way with forcing or trying to force someone to have any kind of sexual contact or relations, when in fact, as defendant VINCENT then knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2018, in the Eastern District of Pennsylvania, defendant

MARC VINCENT

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant VINCENT stated in response to question 22 that he had not committed, assisted in committing, or attempted to commit a crime or offense for which he had not been arrested, when in fact, as defendant VINCENT then knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 9, 2018, in the Eastern District of Pennsylvania, defendant

MARC VINCENT

Knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-445, Notice of Naturalization Oath Ceremony, defendant VINCENT stated in response to question 3 that he had not committed any crime or offense, for which he had not been arrested, when in fact, as defendant VINCENT then knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

A TRUE BILL:


FOREPERSON



JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MARC VINCENT

INDICTMENT

Counts

18 U.S.C. § 1425(a) (procurement of citizenship unlawfully – 1 count)
18 U.S.C. § 1425(b) (procurement of citizenship unlawfully – 1 count)
18 U.S.C. § 1015(a) (false statements in relation to naturalization - 3 counts)

A true bill



Filed in open court this 20 day,
Of June A.D. 20 23

Clerk

Bail, \$ _____
